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Attorneys for Defendant City of East Orange Police Department

TAKESHA ROBERTS, As Administrator Ad
Prosequendum for the heirs-at-law of Karlando
Roberts and as General Administrator of the
Estate of Karlando Roberts, deceased,

Plaintiff,

-vs.-

POLICE DEPARTMENT OF THE CITY OF
EAST ORANGE, NEW JERSEY, CAROLYN
MURRAY, ACTING PROSECUTOR OF
ESSEX COUNTY, JOHN DOE, JANE ROE,
AND JOHN JONES fictitiously named
defendants whose names are presently
unknown,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY
DOCKET NO.: ESX-L-0473-14

Civil Action

**NOTICE OF REMOVAL TO UNITED
STATES DISTRICT COURT**

PLEASE TAKE NOTICE THAT on this date, the Defendant City of East Orange Police Department, by and through counsel, Michael A. D'Aquanni, Esq., of Roth D'Aquanni, LLC, has filed this Notice of Removal pursuant to 28 U.S.C. § 1446(a) in the office of the Clerk of the United States District Court for the District of New Jersey in Newark, New Jersey.

These defendants, by their undersigned, say:

1. Plaintiff Takesha Roberts brought an action against this defendant in the Superior Court of New Jersey, Law Division, Essex County, on or about January 23, 2014. A copy of the Complaint with jury demand is annexed hereto as Exhibit 1.

2. The summons, complaint and jury demand were first served on these defendants on February 4, 2014.

3. Upon information and belief, there have no other pleadings filed or proceedings in this action. Defendants have not filed an Answer to the Complaint, but will do so within seven (7) days of this filing pursuant to F.R.Civ.P. 81(c)(2)(C).

4. The City of East Orange is a municipal corporation with its principal place of business in East Orange, New Jersey, in Essex County.

5. The United States District Court for the District of New Jersey has jurisdiction over the subject matter of this action inasmuch as plaintiffs' initial pleading asserts that the City of East Orange Police Department and the Essex County Prosecutor's Office violated their civil rights pursuant to 42 U.S.C. § 1983.

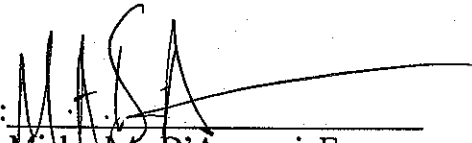
6. This notice is filed with this Court within thirty (30) days of defendants' receipt of a copy of the initial pleading naming these defendants as parties and setting forth the claim upon which the plaintiff's action or proceeding is based, as provided in 28 U.S.C. § 1446(b).

PLEASE TAKE FURTHER NOTICE that Defendant City of Orange Police Department, through its attorney, upon filing the Notice of Removal in the Office of the Clerk of the United States District Court for the District of New Jersey, has also filed a copy of same with the Clerk of the Superior Court of New Jersey, Essex County, to effect removal of this action to the United States District Court pursuant to 28 U.S.C. § 1446(b). A copy of the correspondence to the Clerk of the Superior Court of New Jersey, Essex County, is annexed hereto as Exhibit 2.

PLEASE TAKE FURTHER NOTICE that Defendant Essex County Prosecutor's Office has consented to the removal of this matter. A copy of the Essex County Prosecutor's consent to removal is annexed hereto as Exhibit 3.

PLEASE TAKE FURTHER NOTICE that Defendant City of East Orange Police Department has provided a copy of this Notice of Removal to counsel for plaintiff, Edward A. Dreskin, Esq., of Dreskin & Dreskin, P.C., 744 Broad St., Newark, New Jersey, 07102. The appropriate Certification of Mailing is annexed hereto as Exhibit 4.

ROTH D'AQUANNI, LLC
Attorneys for Defendant Township of Irvington and
Township of Irvington Police Department

By: 
Michael A. D'Aquanni, Esq.

DATED: March 5, 2014